## IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF GEORGIA ATHENS DIVISION

GREAT DANE LIMITED PARTNERSHIP	)
Plaintiff,	) )
v.	Civil Action No. 3:08-CV-89 (CDL)
-STOUGHTON-TRAILERS, LLC and	) }
NEWCOURT, INC.,	Judge Clay D. Land
Defendants.	) )

## GREAT DANE LIMITED PARTNERSHIP'S MOTION TO SUPPLEMENT THE RECORD

The plaintiff, GREAT DANE LIMITED PARTNERSHIP, by its attorneys, moves this Court to supplement the record with respect to Great Dane's Motion to Re-Open Case, and in support thereof states:

- 1. This case is administratively closed as a result of the bankruptcy of the defendant, Newcourt, Inc.
  - 2. Great Dane filed a Motion to Re-Open Case on April 6, 2010.
- 3. Great Dane also filed a Motion for Modification of the Automatic Stay to Continue District Court Litigation, in Case No. 09-50315-BTR, In the United States Bankruptcy Court for the Eastern District of Texas, *In re Newcourt, Inc.*
- 4. The bankruptcy court entered the Order attached to this Motion as Exhibit A on April 20, 2010.
- 5. Great Dane merely wishes to bring to this Court's attention the entry of this Order by the bankruptcy court.

WHEREFORE, the plaintiff, GREAT DANE LIMITED PARTNERSHIP, moves this

Court for leave to supplement the record in connection with the Motion to Re-Open Case previously filed in this matter.

Respectfully submitted,

## **GREAT DANE LIMITED PARTNERSHIP**

By: s/limothy-M. McCarthy-One of its Attorneys

David J. Marr, dmarr@trexlaw.com
Timothy M. McCarthy, tmccarthy@trexlaw.com
TREXLER, BUSHNELL, GIANGIORGI,
BLACKSTONE & MARR, LTD.
105 W. Adams, 36th Floor
Chicago, Illinois 60603
tel: (312) 704-1890

tel: (312) 704-1890 tax: (312) 704-8023

John M. Tatum, *JTatum@HunterMaclean.com* HUNTER, MACLEAN, EXLEY & DUNN, P.C. P.O. Box 9848
Savannah GA 31412
tel: 912 236 0261

tel: 912 236 0261 fax: 912 236 4936s

AN3582.DOC

## **CERTIFICATE OF SERVICE**

I, Timothy M. McCarthy, declare that I served the foregoing document titled **GREAT DANE LIMITED PARTNERSHIP'S MOTION TO SUPPLEMENT THE RECORD** on the following counsel by email on April 21, 2010:

Jonathan H. Margolies, jhmargolies@michaelbest.com
Katherine W. Schill, kwschill@michaelbest.com
Ian A.J. Pitz, iapitz@michaelbest.com
MICHAEL, BEST & FRIEDRICH
100 East Wisconsin Avenue
Suite 3300
Milwaukee, WI 53202-4108

Shaun Michael Daugherty, sdaugherty@hbss.net HALL, BOOTH, SMITH & SLOVER, P.C. 1180 W. Peachtree St., N.W. Atlantic Center Plaza, Stc. 900 Atlanta GA 30309-3479

Sumner C. Rosenberg, <u>rosenbergs@ballardspahr.com</u> BALLARD SPAHR ANDREWS & INGERSOLL, LLP 999 Peachtree St., St. 1000 Atlanta GA 30309

s/Timothy M. McCarthy